

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DEFENDANT GOOGLE LLC'S NOTICE OF  
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and Declarations of Sara B. Tomezsko, Kevin Lucas, Brian Ong, Frank Wagner, and Bernita Jamison, Defendant Google LLC, through its undersigned counsel, hereby moves this Court, before the Honorable Lorna G. Schofield, at the United States District Court, 40 Centre Street, Room 1106, New York, New York 10007, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and the Stipulated Protective Order for the Treatment of Confidential Information dated February 4, 2020, (ECF 23), for an Order permitting it to retain under seal certain documents or portions thereof submitted in connection with Plaintiff's Motion for Summary Judgment (ECF 152).

PLEASE TAKE FURTHER NOTICE that, Plaintiff's opposition, if any, shall be due on December 17, 2021, and Google's reply due December 24, 2021.

Dated: Jersey City, New Jersey  
December 10, 2021

PAUL HASTINGS LLP

  
By: Kenneth W. Gage  
Sara Tomezsko

200 Park Avenue  
New York, NY 10166  
Tel: (212) 318-6000  
Fax: (212) 319-4090  
kennethgage@paulhastings.com  
saratomezsko@paulhastings.com

*Attorneys for Defendant*  
GOOGLE LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this 10th day of December 2021, I caused a true and exact copy of the foregoing DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO RETAIN DOCUMENTS UNDER SEAL, MEMORANDUM OF LAW, and the accompanying declarations and exhibits to be filed electronically and served by mail on anyone unable to accept electronic filing. Notice and copies of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: Jersey City, New Jersey  
December 10, 2021

  
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Sara B. Tomczko